



October 31, 2022

Submitted Electronically

The Honorable Sandra Thompson
Director
Federal Housing Finance Agency
400 7th Street, SW
Washington, DC 20019

Dear Director Thompson,

The Wisconsin Bankers Association (WBA) is the largest financial trade association in Wisconsin, representing nearly 200 state and nationally chartered banks, savings and loan associations, and savings banks. WBA appreciates the opportunity to comment on the Federal Housing Finance Agency's (FHFA) comprehensive review of the Federal Home Loan Bank system (FHLB).

As part of its review, FHFA has requested comment within six areas, which overall, discuss FHLB's operation. FHLB plays a vital role in supporting affordable, equitable, and sustainable access to mortgage credit. In order to assist FHFA with its review in support of FHLB's overall mission, WBA offers the following comments on behalf of its membership.

The FHLB's mission is to provide reliable liquidity to its member institutions to support housing finance and community investment. The system has been a fundamental part of the nation's financial system for more than eight decades, providing a source of funding for mortgages and asset-liability management, liquidity for short-term needs, and additional funds for housing finance and community development. In this, FHLB has been successful in achieving its mission. Wisconsin member institutions have benefitted through utilization of the alternative liquidity sources provided by FHLB of Chicago, which has been provided through private funding, without taxpayer assistance, through all economic conditions.

WBA applauds this success and supports continuation of the system and its programs. Wisconsin banks have been responsive to the various programs, products, and services offered through the system and appreciative of their partnership with the FHLBanks, particularly FHLBank of Chicago. Specifically, WBA members have acknowledged the value of the products available through the Mortgage Partnership Finance Program. As an additional mention, given that membership is geographically determined, Wisconsin banks have also found it helpful to have specific, regional tools available. Lastly, WBA wanted to mention that Wisconsin banks responded favorably to program assistance made available by FHLBank of Chicago through the recent difficulty presented by the COVID-19 pandemic in making modifications available to their customers in need.

Conclusion

WBA offers these comments in appreciation of FHLB's pursuit of its mission to support

mortgage lending and related community investment activity. We appreciate the opportunity to share our membership's appreciation of their relationship with the FHLB system, provided as part of FHFA's comprehensive review. We look forward to further engagement on these topics and working together to continue to ensure a vibrant, responsive, and safe FHLBank System.

WBA appreciates the opportunity to comment.

Thank you,

A handwritten signature in cursive script that reads "Rose Oswald Poels".

Rose Oswald Poels
President/CEO